

I disagree with a cap of 10 applications during the upcoming NCE window. After a 7 year wait, as a potential applicant I have conscientiously put together many more applications than 10 with no intent towards "speculation" and selling of Construction Permits. A conservative growth rate of 2 or more stations per year for a corporation seeking to provide quality programming in underserved markets immediately exceeds this cap of 10, given the 7 year freeze.

Over these last 7 years, many relationships have been established with local community groups who have requested a noncommercial station for their community. Work has been completed to satisfy needed studio location, antenna space on towers, or with property owners for building new towers. A great amount of time and money has been spent in expectation of being able to file.

It is reasonable to require a limit on the number of applications filed, due to the speculation which plagued filings before the freeze, and especially during the 2003 Commercial Translator Window.

A reasonable cap of 40 applications for this filing period, by either a single applicant or by multiple corporations where crossownership exists would allow legitimate, interested parties to serve the public interest without hindrance.

I urge the Commission to raise the cap ceiling for this window, and mandate a requirement for a yearly filing window. Subsequent windows should then be limited by a maximum of 10 applications by any single entity, or in situations where crossownership exists.